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Attorneys for Plaintiffs and the Class

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES—SPRING STREET COURTHOUSE

RHINA BLANCO, individually, and on behalf of other members of the general public similarly situated and on behalf of other aggrieved employees pursuant to the California Private Attorneys General Act; CARLOS GONZALEZ, individually, and on behalf of other members of the general public similarly situated and on behalf of other aggrieved employees pursuant to the California Private Attorneys General Act;

Plaintiffs,

vs.

AUTISM LEARNING PARTNERS, an unknown business entity; AUTISM LEARNING PARTNERS, LLC, a Delaware limited liability company; PACIFIC CHILD & FAMILY ASSOCIATES, LLC, an unknown business entity; PROOF POSITIVE ABA THERAPIES, LLC, a California limited liability company; CHILDREN'S LEARNING CONNECTION, INC., a California corporation; A IS FOR APPLE, INC., a California corporation; and DOES 2 through 100, inclusive,

Defendants.

Case No. 24STCV01979

Honorable Timothy P. Dillon
Department 15

CLASS ACTION

DECLARATION OF RYAN SLINGER IN SUPPORT OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF CLASS ACTION AND PAGA SETTLEMENT, CLASS COUNSEL FEES PAYMENT, CLASS COUNSEL LITIGATION COSTS PAYMENT, AND CLASS REPRESENTATIVE SERVICE PAYMENTS

Date: April 7, 2026
Time: 10:00 a.m.
Department: 15

Complaint Filed: January 24, 2024
FAC Filed: February 24, 2025
Trial Date: None Set

DECLARATION OF RYAN SLINGER

I, Ryan Slinger, hereby declare as follows:

1. I am an attorney licensed to practice law in the State of California. I am a member of Lawyers *for* Justice, PC, attorneys of record for Plaintiff Rhina Blanco and Carlos Gonzalez (together, “Plaintiffs” or “Class Representatives”) and the Class in the above-captioned matter. The facts set forth in this declaration are within my personal knowledge or based on information and belief, and, if called as a witness, I could and would competently testify as follows.

PRELIMINARY APPROVAL OF SETTLEMENT

2. On November 4, 2025, in Department 15 of the above-entitled Court, the Honorable Timothy P. Dillon preliminarily approved the First Amended Class, Collective and PAGA Representative Action Settlement Agreement and Class Notice (“Settlement,” “Agreement,” or “Settlement Agreement,”) entered into between Plaintiffs and Defendants Autism Learning Partners, Autism Learning Partners, LLC, Pacific Child & Family Associates, LLC, Proof Positive ABA Therapies, LLC, Children’s Learning Connection, Inc., and A is for Apple, Inc. (collectively, “ALP” or “Defendants”) (collectively with Plaintiffs referred to as the “Parties”) and conditionally certified the Class for settlement purposes. The Court provisionally appointed Plaintiffs Rhina Blanco and Carlos Gonzalez as the representatives of the Class (“Class Representatives”). The Court also provisionally appointed and designated Lawyers *for* Justice, PC as counsel for the Class (“Class Counsel”).

3. The Court approved and ordered the mailing of the Notice of Class, Collective, and PAGA Representative Action Settlement (“Class Notice”), adopted the notice, opt-out, and objection procedures and ordered their implementation. The Court appointed ILYM Group, Inc. (“ILYM”) to serve as the third-party settlement administrator and handle the notice and settlement administration process.

4. As of the date of filing the accompanying Motion for Final Approval of Class Action Settlement, Class Counsel Fees Payment, Class Counsel Litigation Costs Payment, and Class Representative Service Payments (“Motion for Final Approval”), no Class Member has

1 objected to the Class Settlement, the contemplated request for Class Counsel Fees Payment,
2 Class Counsel Litigation Costs Payment, Class Representative Service Payments, and
3 Administration Expenses Payment , or the allocation for the PAGA Penalties.

4 **WORK PERFORMED BY CLASS COUNSEL**

5 5. Several attorneys at Lawyers *for* Justice, PC have been actively performing work
6 in the above-captioned action entitled *Rhina Blanco, et al. v. Autism Learning Partners, et al.*,
7 Los Angeles Superior Court, Case No. 24STCV01979 (the “Action”), since it was filed on
8 January 24, 2024.

9 6. Before initiating the case, Lawyers *for* Justice, PC investigated and researched the
10 facts and circumstances underlying the pertinent factual and legal issues and applicable law. This
11 required thorough discussions and interviews between attorneys at Lawyers *for* Justice, PC and
12 Plaintiffs and research into the various legal issues involved in the case, namely, the current state
13 of the law as it applied to class certification, manageability, representative adjudication, and trial;
14 the law relating to off-the-clock theory, regular rate, meal and rest periods, expense
15 reimbursements, recordkeeping and wage statement requirements, representative Private
16 Attorneys General Act ("PAGA") claims and penalties, and wage-and-hour law and enforcement,
17 Plaintiffs’ claims and allegations, and potential defenses. After conducting an initial
18 investigation, Lawyers *for* Justice, PC determined that the claims of Plaintiffs were well-suited
19 for class-wide and representative adjudication, owing to what appeared to be a common course
20 of conduct affecting a similarly situated group of current and former hourly-paid or non-exempt
21 employees who worked for Defendants in California, who were not properly compensated for,
22 *inter alia*, all hours worked, non-compliant meal and rest periods, and business expenses.

23 7. Class Counsel conducted significant informal discovery and investigation into the
24 facts of the case, to assess the veracity, strength, and scope of the claims, and were preparing the
25 case for class certification and trial, prior to reaching the Settlement. The Parties exchanged a
26 volume of information, documents, and data throughout the course of the litigation and in
27 connection with the mediation and settlement negotiations. The volume of data and documents
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1 that Class Counsel reviewed and analyzed included, and was not limited to: a sampling of Class
2 Members' time and payroll data, Plaintiffs' personnel records, Defendants' Handbooks, earning
3 statements, arbitration agreements, company policy acknowledgements (e.g., Policy
4 Acknowledgement Status Report, Employee Acknowledgement, Meal and Rest Period Policy
5 and Acknowledgement, Employee Handbook acknowledgment, Frequently Asked Questions
6 Acknowledgement, Job Description Review, Training Review, Transportation Policy,
7 Confidentiality Agreement, Returning Company Property Agreement, Supplemental Policies
8 Packet, Video Recording Policy, Zero Tolerance Policy), among other information and
9 documents. Class Counsel had the opportunity to interview and obtain information from
10 Plaintiffs and percipient witnesses, and reviewed and analyzed a volume of information, data,
11 and documents obtained from Plaintiffs, Defendants, and other sources. Class Counsel developed
12 liability, damages, violation, and penalties valuation models in the course of litigation and in
13 connection with the mediation and settlement negotiations, and met and conferred with
14 Defendants' counsel on numerous occasions, e.g., to discuss issues relating to the pleadings, case
15 management, motion practice, informal discovery, and the production of information,
16 documents, and data in the course of litigation and in connection with mediation and settlement
17 negotiations, and settlement. Other work performed by Class Counsel included, and was not
18 limited to, case strategy and analysis; researching, drafting, reviewing, and/or revising the
19 pleadings, motion-related papers, the mediation briefing and supporting materials, and settlement
20 documents; and preparing for and attending court proceedings, mediation, and settlement
21 negotiations, among other tasks.

22 8. As outlined herein, the Parties have conducted significant investigation and
23 informal discovery during the course of litigating this matter, mediation, and extensive
24 settlement negotiations. Class Counsel analyzed a volume of pages of information, documents,
25 and data obtained from Plaintiffs, Defendants, and other sources that provided a critical
26 understanding of the nature of the work performed by the Class Members and Aggrieved
27 Employees, as well as Defendants' organizational structures and their operations and
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1 employment policies, practices, and procedures. The information, documents, and data were used
2 in analyzing liability, damages, penalties, and other valuation issues in connection with all
3 phases of the litigation, and ultimately, in connection with the mediation and settlement
4 negotiations process. Class Counsel also performed significant research into the applicable law,
5 which is evolving as it relates to class certification, manageability, representative adjudication,
6 and trial; the law relating to off-the-clock theory, regular rate, meal and rest periods, expense
7 reimbursements, recordkeeping and wage statement requirements, representative PAGA claims
8 and penalties, and wage-and-hour law and enforcement, Plaintiffs' claims and allegations, and
9 potential defenses thereto, as well as facts discovered.

10 9. After conducting significant investigation of the facts and law during the
11 prosecution of this matter, counsel for the Parties engaged in extensive settlement negotiations to
12 try to resolve the cases. These efforts included participating in a mediation session conducted by
13 Lynn Frank, Esq., a well-regarded mediator experienced in handling complex labor and
14 employment matters. During all settlement discussions, the Parties conducted their negotiations
15 at arm's length in an adversarial position. In the course of the mediation and settlement
16 negotiations, the Parties exchanged extensive information and engaged in discussions regarding
17 their evaluations of the case and various aspects of the case, including but not limited to, the
18 risks and delays of further litigation, the risks to the Parties of proceeding with class certification
19 and/or representative adjudication, the law relating to off-the-clock theory, regular rate, meal and
20 rest periods, PAGA representative actions, and state wage-and-hour law and enforcement, as
21 well as the evidence produced and analyzed, and the possibility of appeals, among other things.
22 Arriving at a settlement that was acceptable to the Parties was not easy. Defendants contended
23 that individualized questions of fact predominate over any common issues, and these issues
24 would pose challenges to class certification and representative adjudication. Defendants and their
25 counsel felt strongly about Defendants' ability to avoid class certification prevail on the merits,
26 while Plaintiffs and Class Counsel believed that they would be able to obtain class certification
27 and prevail at trial. With the aid of the mediator's evaluation, the Parties ultimately agreed that
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1 this matter was well-suited for settlement given the legal issues relating to Plaintiffs' principal
2 claims, as well as the costs and risks to the Parties that would attend further litigation. These
3 risks of further litigation include, and are not limited to, a determination that the claims are
4 unsuitable for class treatment and/or representative adjudication, class de-certification after
5 certification of a class, allowing a jury to decide the claims asserted in this matter, and the real
6 possibility of no monetary recovery after years of litigation.

7 10. By way of the accompanying Motion for Final Approval, Class Counsel seeks
8 attorneys' fees in the amount of \$833,333.33, which is one-third (1/3) of the Gross Settlement
9 Amount of \$2,500,000.00. Pursuant to the contingency-fee agreement entered into by and
10 between Plaintiffs and Class Counsel, Plaintiffs have agreed to a contingency fee of at least one-
11 third (1/3) of the recovery.

12 11. The attorneys' fees sought are commensurate with: (1) the risk that Class Counsel
13 took in commencing the case; (2) the time, effort, and expense that Class Counsel dedicated to
14 the case; (3) the skill and determination that Class Counsel has shown; (4) the results that Class
15 Counsel has achieved throughout the litigation; (5) the value of the settlement that Class Counsel
16 has achieved in this matter; and (6) the other cases that Class Counsel has turned down in order
17 to devote their time and efforts to this case. The nature of the work performed, skill exercised,
18 and the outcome in this matter which involves an outstanding monetary recovery involving a
19 **Gross Settlement Amount of \$2,500,000.00** (with a Net Settlement Amount of approximately
20 **at least \$832,092.71 to be paid to Participating Class Members** (with gross Individual Class
21 **Payments averaging approximately more than \$57.32), payment of \$187,500.00 to**
22 **Aggrieved Employees** (with Individual PAGA Payments averaging approximately \$23.09) and
23 **payment of \$562,500.00 to the State of California**)—support the percentage fee sought.

24 12. While not necessarily required to be demonstrated because a percentage fee is
25 proper for this settlement, it should be noted that Class Counsel has incurred many hours of work
26 in connection with prosecuting this matter such that the award of attorneys' fees is also justified
27 under a lodestar analysis. Attorneys at Lawyers *for* Justice, PC have spent a total of **371.80**
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1 **hours** performing tasks and obtaining recovery in this matter. Attached hereto as “**EXHIBIT 1**”
2 is an Attorney Task and Time Chart that sets forth in detail the nature of the legal services
3 provided by attorneys at Lawyers *for* Justice, PC and the time incurred by them in performing
4 those services. These hours include work done by several attorneys at Lawyers *for* Justice, PC.
5 Also, separate from the hours referenced herein and in the chart, Lawyers *for* Justice, PC had
6 litigation support personnel actively engaged in assisting with the prosecution of this matter.

7 13. The work performed in this particular matter, the background of Lawyers *for*
8 Justice, PC, as well as the individual backgrounds, training, and experience of the attorneys who
9 worked on this matter, in litigating complex wage-and-hour actions, and in particular,
10 employment class action and representative action cases, support a reasonable blended hourly
11 rate of compensation of at least \$850 per hour for work performed by Lawyers *for* Justice, PC.
12 Lawyers *for* Justice, PC has been awarded attorneys’ fees, compensating the firm at the rate of at
13 least \$850 per hour for legal services performed, by courts granting approval of settlements in
14 other wage-and-hour class action and representative action cases: final approval of the class and
15 representative action settlement in *David Dugan v. TEC Equipment, Inc., et al.* (Los Angeles
16 Superior Court Case No. 19STCV01591) was granted on July 8, 2021, and the award of
17 attorneys’ fees involved compensation at the rate of \$936.47 per hour; final approval of the class
18 and representative action settlement in *Larry Greenwood, et al. v. Scan Health Plan* (Los
19 Angeles Superior Court Case No. BC715157) was granted on April 20, 2021, and the award of
20 attorneys’ fees involved compensation at the rate of \$919.57 per hour; final approval of the class
21 and representative action settlement in *Seth Swan v. Pace Supply Corp.* (Sonoma County
22 Superior Court Case No. SCV258764) was granted on February 6, 2019, and the award of
23 attorneys’ fees involved compensation at the rate of \$855.96 per hour.

24 **EXPERIENCE AND ADEQUACY OF**

25 **LAWYERS *for* JUSTICE, PC**

26 14. For over a decade, Lawyers *for* Justice, PC has almost exclusively focused on the
27 prosecution of consumer and employment class actions, involving wage-and-hour claims, race
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discrimination, unfair business practices, or consumer fraud. Currently, Lawyers *for* Justice, PC is the attorney of record in well over a dozen employment-related putative class actions in both state and federal courts in the State of California. Lawyers *for* Justice, PC is comprised of attorneys who focus on litigating complex wage-and-hour class and Private Attorneys General Act (“PAGA”) representative actions. The firm has successfully litigated cases involving nearly every aspect of California wage and hour law, including payment of overtime and minimum wages, provision of meal and rest breaks and/or premiums wages for same, timely payment of wages, provision of compliant wage statements, reimbursement of business expenses, executive, administrative, and other overtime exemptions to the State of California and federal overtime compensation requirements, PAGA claims, and sister statutes under federal law. During a relatively short time, in association with other law firms, Lawyers *for* Justice, PC has recovered millions of dollars on behalf of thousands of individuals in California.

15. Edwin Aiwarzian is a Managing Member and Shareholder of Lawyers for Justice, PC. He received his Bachelor of Arts degree from Pepperdine University in April of 1999 and earned a Juris Doctor degree from Pepperdine University School of Law in May of 2004. He has extensive formal training in dispute resolution and negotiation from the Straus Institute for Dispute Resolution as part of its Masters in Dispute Resolution degree program. In addition, he has previously served as a pro bono mediator for the Los Angeles County Superior Court. In October of 2000, he obtained a Litigation Paralegal Certificate from the UCLA Extension Program. During the summer of 2000, he studied Legal Writing at Harvard University. From approximately September 2002 to approximately December 2002, he served as a Judicial Extern to the Honorable Kim McLane Wardlaw of the United States Court of Appeals for the Ninth Circuit. From approximately June 2002 to approximately August 2002, he served as a Judicial Extern to the Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District. In December of 2004, he obtained a license to practice law from the California State Bar. Since in or around October of 2008, through his work at Lawyers *for* Justice, PC, he has almost exclusively focused on the prosecution of consumer and employment

1 class actions. While employed by Lawyers *for* Justice PC, he has argued over one hundred (100)
2 motions, taken or defended over one hundred fifty (150) depositions, prepared dozens of expert
3 witnesses for deposition or trial, and attended over one hundred seventy-five (175) mediations.
4 Together with other attorneys at the firm, and in some cases in conjunction with co-counsel, he
5 has successfully litigated cases involving the executive, administrative, and other overtime
6 exemptions to the State of California and federal overtime compensation requirements. Under
7 his supervision, Lawyers *for* Justice, PC has successfully obtained class certification by
8 contested motion practice in approximately sixteen (16) cases in the last decade, and litigated
9 over 1,000 class action or representative action cases.

10 16. Arby Aiwarzian is a Member and Shareholder of Lawyers *for* Justice, PC. He
11 received his Bachelor of Arts degree from University of California, Los Angeles and graduated
12 magna cum laude. He earned a Juris Doctor degree, cum laude, from Southwestern Law School.
13 From approximately May 2007 to approximately July 2007, he served as a Judicial Extern to the
14 Honorable Earl Johnson, Jr. of the California Court of Appeal for the Second Appellate District.
15 From approximately August 2008 to approximately December 2008, he served as a Judicial
16 Extern to the Honorable Kim McLane Wardlaw of the United State Court of Appeals for the
17 Ninth Circuit. He was admitted to practice law in California in 2010. He is admitted to practice
18 before all courts of the State of California and all United States District Courts in the State of
19 California. He has worked on many wage-and-hour class action and representative action cases,
20 taking the lead in taking and defending depositions, arguing motions, and attending mediations.
21 He has played an integral role in preparing matters for class certification, including and not
22 limited to, successful certification of a class in *Upson v. Sur La Table* (Los Angeles County
23 Superior Court Case No. BC424012), *Montazemi v. Regus Management* (Los Angeles County
24 Superior Court Case No. BC478769), and *Abdulhaqq v. Urban Outfitters* (Alameda County
25 Superior Court Case No. RG13680477). Under his supervision, dozens of class action or
26 representative action cases have resulted in settlements that have been granted court approval. He
27 has handled over one hundred and fifty (150) mediations and worked on over two hundred and
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fifty (250) class action or representative action cases which have resulted in settlement.

17. Joanna Ghosh is a Managing Member of Lawyers *for* Justice, PC. She received a Bachelor of Arts degree from California State University, Los Angeles in 2006, a Master of Science degree from the London School of Economics in 2007, and a Juris Doctor degree from Georgetown University Law Center in 2010. She is admitted to practice in California (since 2010) and in New York (since 2013) and she is also admitted to practice in all U.S. District Courts in California, the U.S. Bankruptcy Court for the Central District of California, and the U.S. Supreme Court. She has taken and defended dozens of depositions and successfully handled motion practice in class action cases regarding discovery (including and not limited to, regarding class contact information), class certification (both contested class certification and stipulated class certification), arbitration agreements, coordination, and intervention. She has successfully handled briefing and oral arguments on appeal and obtained notable decisions regarding Private Attorneys General Act claims and employer efforts to compel arbitration of such claims, e.g., *Roberto Betancourt v. Prudential Overall Supply* (Cal. Ct. App., Mar. 7, 2017) 9 Cal.App.5th 439, cert. denied (Cal., May 24, 2017), cert. denied (U.S., Dec. 11, 2017) and *ZB, N.A. v. Superior Court* (2019) 8 Cal.5th 175. She has significant experience with class actions, including and not limited to working on cases to obtain class certification through contested motion practice and working on cases in the post-certification stage (e.g., post-certification discovery, appeal, statistical sampling and pilot study, and trial preparation in conjunction with co-counsel in a case involving a certified class consisting of approximately 2,600 individuals). She has extensive experience with class action and/or representative action settlements, and has handled this process in over five hundred (500) cases. Under her, Edwin Aiwasian, and Arby Aiwasian's supervision, Lawyers *for* Justice, PC has handled the class certification and court approval process for hundreds of class action and/or representative action matters that have successfully resolved. Joanna Ghosh is a member of the California Employment Lawyers Association and, on several occasions, has been a speaker regarding topics in wage and hour law at the organization's continuing legal education events.

1 18. I am a Member of Lawyers for Justice, PC. I received my Bachelor of Arts degree
2 from the University of Michigan in 2020, and I earned my Juris Doctor degree from Loyola Law
3 School in 2023. I was admitted to practice law in California in 2023. I am admitted to practice
4 before all courts of the State of California. I have worked on many wage-and-hour class action
5 and PAGA representative cases, and my work on these cases has included preparing pleadings
6 and motions, making court appearances, and drafting and finalizing settlement agreements.

7 **LITIGATION COSTS AND EXPENSES INCURRED BY**

8 **LAWYERS *FOR* JUSTICE, PC**

9 19. To date, Class Counsel has borne all of the risks and costs of litigation and will
10 not receive any compensation until recovery is obtained in this matter. The Settlement provides
11 for reimbursement of litigation costs and expenses of up to \$25,000.00. Lawyers *for* Justice, PC
12 seeks reimbursement of **\$19,623.96** in litigation costs and expenses incurred in the matter, as
13 reflected in “**EXHIBIT 2**” attached hereto. These expenses were reasonable and necessary in the
14 prosecution of the matter and to obtain the Settlement. The cost savings of \$5,376.04 will be part
15 of the Net Settlement Amount, which will be distributed to the Participating Class Members in
16 accordance with the Settlement.

17 **CLASS REPRESENTATIVE SERVICE PAYMENTS TO PLAINTIFFS**

18 20. In recognition of their efforts and work spearheading the prosecution of this
19 matter and serving as the Class Representatives, as well as their broader individual waiver and
20 release of claims with a California Civil Code Section 1542 waiver (set forth in Paragraph 6.1.1
21 of the Settlement Agreement), the Settlement provides for Class Representative Service
22 Payments, in the amount of up to \$7,500.00 to each Plaintiff. Plaintiffs spent a substantial
23 amount of time and effort discussing their employment with Class Counsel, gathering and
24 providing relevant documents and information, and providing facts and evidence to support the
25 prosecution of the claims. Plaintiffs were available whenever Class Counsel needed them and
26 actively tried to obtain and provide information that would help obtain a recovery in this matter.
27 Accordingly, it is appropriate for Plaintiffs to receive \$7,500.00 each, as reasonable Class
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Representative Service Payments for their broader waiver and release of claims and services performed in this matter, in addition to their individual settlement payments.

21. I submit that the Settlement is fair, reasonable, and adequate, and is in the best interests of Plaintiffs, the Class, Aggrieved Employees, and the State of California.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 11th day of March 2026, at Glendale, California.



Ryan Slinger

EXHIBIT 1

RHINA BLANCO, V. AUTISM LEARNING PARTNERS
Los Angeles County Superior Court Case No. 24STCV01979

ATTORNEY TASK AND TIME CHART

TASK	LAWYERS <i>for</i> JUSTICE, PC
Investigation and Research / Due Diligence	
Meet, Communicate, and/or Review Communication with Plaintiff Rhina Blanco (“Plaintiff Blanco”)	8.50
Meet, Communicate, and/or Review Communication with Plaintiff Carlos Gonzalez (“Plaintiff Gonzalez”)	6.50
Investigate, Communicate with, Interview, and/or Review Communication with Putative Class Members, Aggrieved Employees, and/or Percipient Witnesses	61.50
Pleadings and Court Filings	
Investigate the Merits of Plaintiff Blanco’s Class Action and Private Attorneys General Act (“PAGA”) Claims, Conduct Legal Research and Analysis Regarding Class and PAGA Claims, and Draft, Review, and/or Revise Plaintiff Blanco’s Class Action Complaint for Restitution & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on January 24, 2024)	7.50
Review Court’s Notice of Case Assignment (filed on January 24, 2024)	0.20
Review Court’s Minute Order Re: Newly Filed Class Action and Initial Status Conference Order (filed on February 16, 2024)	0.40
Review Defendants Autism Learning Partners, LLC and Proof Positive ABA Therapies, LLC Notice of Appearance (served on March 29, 2024)	0.40
Review Defendant Autism Learning Partners, LLC’s Substitution of Attorney (served on April 4, 2024)	0.20
Draft, Review, and/or Revise Plaintiff Blanco’s Notice of Posting Jury Fees (filed on April 29, 2024)	0.20

Review Notice of Related Case (filed May 9, 2024) and Review and Analyze Register of Actions and/or Filings in <i>Aswaad Tariq Balderos v. Autism Learning Partners, LLC</i> , Los Angeles Superior Court, Case No. 24STCV04512	1.60
Meet and Confer with Defendant Autism Learning Partners, LLC's Counsel, and Draft, Review, and/or Revise Joint Initial Status Conference Statement (filed on May 22, 2024)	1.20
Review Court's Minute Order Re: Notice of Related Case and Minute Order Re: Continuance (filed on May 29, 2024)	0.30
Draft, Review, and/or Revise Plaintiff Blanco's Notice of Minute Order Re: Notice of Related Case and Minute Order Re: Continuance (filed on May 31, 2024)	0.20
Review Court's Minute Order Re: Initial Status Conference (filed on June 3, 2024)	0.10
Meet and Confer with Defendants Autism Learning Partners, Autism Learning Partners, LLC, Pacific Child & Family Associates, LLC, Proof Positive ABA Therapies, LLC, and Children's Learning Connection, Inc.'s Counsel, and Draft, Review, and/or Revise Joint Stipulation to Continue Initial Status Conference; [Proposed] Order (submitted on September 3, 2024)	1.40
Meet and Confer with Defendants Autism Learning Partners, Autism Learning Partners, LLC, Pacific Child & Family Associates, LLC, Proof Positive ABA Therapies, LLC, and Children's Learning Connection, Inc.'s Counsel, and Draft, Review, and/or Revise Joint Initial Status Conference Class Action Response Statement (filed on September 6, 2024)	0.80
Review Court's Minute Order Re: Continuance and Order to Continue Initial Status Conference (filed on September 12, 2024)	0.20
Draft, Review, and/or Revise Plaintiff Blanco's Notice of Entry of Judgment or Order (filed on September 13, 2024)	0.20
Meet and Confer with Defendants Autism Learning Partners, Autism Learning Partners, LLC, Pacific Child & Family Associates, LLC, Proof Positive ABA Therapies, LLC, and Children's Learning Connection, Inc.'s Counsel, and Draft, Review, and/or Revise Joint Initial Status Conference Statement and Notice of Settlement (filed on September 24, 2024)	1.10
Review Court's Notice Re: Continuance of Hearing and Order (filed on November 19, 2024)	0.10

Review Court's Minute Order Re: Initial Status Conference (filed on November 22, 2024)	0.10
Draft, Review, and/or Revise Plaintiff Blanco's Notice of Change of Address or Other Contact Information (filed on January 22, 2025)	0.10
Research, Draft, Review, and/or Revise Plaintiff Blanco and Plaintiff Gonzalez's (together, "Plaintiffs") First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq.; Meet and Confer with Defendants Autism Learning Partners, Autism Learning Partners, LLC, Pacific Child & Family Associates, LLC, Proof Positive ABA Therapies, LLC, and Children's Learning Connection, Inc.'s Counsel, and Draft, Review, and/or Revise Joint Stipulation Granting Plaintiff Blanco's Leave to File First Amended Complaint; [Proposed] Order Thereon (submitted on February 7, 2025)	3.50
Meet and Confer with Defendants Autism Learning Partners, Autism Learning Partners, LLC, Pacific Child & Family Associates, LLC, Proof Positive ABA Therapies, LLC, and Children's Learning Connection, Inc.'s Counsel, and Draft, Review, and/or Revise Joint Initial Status Conference Class Action Response Statement (filed on February 13, 2025)	1.10
Review Court's Order Granting Plaintiff Blanco's Leave to File First Amended Complaint (filed on February 19, 2025)	0.10
Review Court's Minute Order Re: Continuance (filed on February 20, 2025)	0.10
Draft, Review, and/or Revise Plaintiffs' Notice of February 20, 2025 Minute Order Continuing the Initial Status Conference and Hearing on Motion for Leave to Intervene (filed on March 3, 2025)	0.20
Draft, Review, and/or Revise Plaintiffs' Notice of Errata and Correction to Plaintiffs' First Amended Class Action Complaint for Damages & Enforcement Under the Private Attorneys General Act, California Labor Code § 2698, Et Seq. (filed on March 7, 2025)	0.70
Meet and Confer with Defendants Autism Learning Partners, Autism Learning Partners, LLC, Pacific Child & Family Associates, LLC, Proof Positive ABA Therapies, LLC, Children's Learning Connection, Inc., and A is for Apple, Inc.'s (collectively, "Defendants") Counsel, and Draft, Review, and/or Revise Joint Initial Status Conference Class Action Response Statement (filed on March 11, 2025)	1.10

Review and Analyze Defendants' Answer to Plaintiffs' Unverified First Amended Complaint (served on April 17, 2025) and Research Affirmative Defenses in Defendants' Answer	1.50
Meet and Confer with Defendants' Counsel, and Draft, Review, and/or Revise Joint Initial Status Conference Statement (filed on July 24, 2025)	1.10
Appearances	
Prepare for, Travel to/from, and Attend Initial Case Management Conference (June 3, 2024)	1.30
Prepare for and Remotely Attend Status Conference (November 22, 2024)	0.20
Prepare for and Remotely Attend Hearing on Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement (October 1, 2025)	1.40
Discovery and Deposition	
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Rhina Blanco (served on January 18, 2024)	1.90
Review and Analyze Documents Produced by Defendant in Response to the Request for Personnel File, Pay Stubs, and Time Records for Plaintiff Carlos Gonzalez (served on January 18, 2024)	2.90
Letters and Correspondence	
Research, Draft, Review, and/or Revise Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Rhina Blanco under the Private Attorneys General Act (served on November 20, 2023)	4.50
Research, Draft, Review, and/or Revise Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Carlos Gonzalez under the Private Attorneys General Act (served on February 9, 2024)	4.50
Draft, Review, and/or Revise Additional Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Rhina Blanco under the Private Attorneys General Act (served on November 22, 2024)	2.30

Draft, Review, and/or Revise Additional Notice to California Labor and Workforce Development Agency Re: Claim of Plaintiff Carlos Gonzalez under the Private Attorneys General Act (served on November 22, 2024)	2.30
Meet with, Draft Correspondence to, Respond to Correspondence from, and/or Review Correspondence with Defendants' Counsel	16.50
Mediation/Settlement	
Review and Analyze Information, Data, and Documents Obtained from Plaintiffs, Defendants, and Other Sources, Including and not Limited to Regarding Defendant's Business and Financial Circumstances and Prior Settlements, Prior to Mediation	74.50
Prepare for Mediation, Including Researching Settlement and Merits-Related Issues, Drafting the Mediation Brief, Compiling the Exhibits in Support of Mediation Brief, Performing, Reviewing, and/or Revising Damages and Penalties Analyses and Calculations, and Preparing PowerPoint Presentation (submitted on August 27, 2024)	36.50
Attend Mediation Session (September 10, 2024; via Zoom Video Conference)	16.50
Engage in Additional Investigations and Research and Communications with Mediator	2.50
Review and/or Analyze Mediator's Proposal (Term Sheet) (executed September 20, 2024)	2.50
Draft, Review, Revise, Negotiate, and Finalize Class, Collective and PAGA Representative Action Settlement Agreement and Class Notice (executed on December 13, 2024)	18.50
Draft, Review, Revise, Negotiate, and Finalize Amended Class, Collective and PAGA Representative Action Settlement Agreement and Class Notice (executed on October 22, 2025)	3.30
Coordinate Settlement Administration with Settlement Administrator, Monitor Settlement Administration and Review Weekly Reports, and Respond to Inquiries	6.50
Law and Motion	

Review and Analyze Intervenor-Plaintiff's Notice of Motion and Motion to Intervene or, in the Alternative, to Relate Cases; Memorandum of Points and Authorities, Declaration of Gregg Lander in Support Thereof, and [Proposed] Order Thereon (filed on July 15, 2024)	3.20
Review Notice of Continuance of Intervenor-Plaintiff's Motion to Intervene or, in the Alternative, to Relate Cases (served on November 20, 2024)	0.10
Draft, Review, and/or Revise Plaintiff Blanco's Opposition to Proposed Intervenor's Motion to Intervene or, in the Alternative, to Relate Cases and Declaration of Jaquelyn Silva in Support Thereof (filed on January 22, 2025)	16.50
Review and Analyze Defendant Autism Learning Partners, LLC's Opposition to Intervenor-Plaintiff's Motion to Intervene or, in the Alternative, to Relate Cases, Declaration of Brittany Wolfson in Support Thereof, Declaration of Paul Berkowitz in Support Thereof, and Request for Judicial Notice in Support Thereof (served on January 23, 2025)	2.10
Review and Analyze Intervenor-Plaintiff's Omnibus Reply in Support of Motion to Intervene or, in the Alternative, to Relate Cases, Supplemental Declaration of Gregg Lander in Support Thereof, and Request for Judicial Notice (served on January 29, 2025)	2.50
Research, Draft, Review, and/or Revise Plaintiffs' Notice of Motion and Motion for Preliminary Approval of Class Action and PAGA Settlement; Memorandum of Points and Authorities in Support Thereof, Declaration of Tara Zabehe in Support Thereof, Declaration of Plaintiff Rhina Blanco in Support Thereof, Declaration of Plaintiff Carlos Gonzales in Support Thereof, and [Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on March 21, 2025)	20.50
Review Intervenor-Plaintiff's Notice of Withdrawal of Motion to Intervene (filed on August 5, 2025)	0.20
Review Court's Minute Order Re: Vacating Initial Status Conference and Hearing on Motion for Leave to Intervene; Continuance of Motion for Preliminary Approval (filed on August 7, 2025)	0.20
Draft, Review, and/or Revise Plaintiffs' Notice of August 7, 2025 Minute Order (filed on August 13, 2025)	0.20
Draft, Review, and/or Revise Supplemental Declaration of Tara Zabehe in Support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement (filed on September 24, 2025)	0.70

Review and Analyze Court's Checklist for Preliminary Approval of Class Action Settlement (filed on October 1, 2025)	0.60
Review Court's Minute Order Re: Hearing on Motion for Preliminary Approval of Settlement (filed on October 1, 2025)	0.20
Draft, Review, and/or Revise Plaintiffs' Notice of October 1, 2025 Minute Order (filed on October 1, 2025)	0.20
Draft, Review, and/or Revise Declaration of Yasmin Hosseini in Support of Plaintiffs' Motion for Preliminary Approval of Class Action and PAGA Settlement and [Revise Proposed] Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on October 29, 2025)	0.90
Review Court's Minute Order Re: Non-Appearance Case Review Re: Submission of Revised Documents for Preliminary Approval (filed on October 31, 2025)	0.10
Review Court's Order Granting Preliminary Approval of Class Action and PAGA Settlement (filed on November 4, 2025)	0.20
Draft, Review, and/or Revise Notice of Entry of Judgment or Order (filed on November 10, 2025)	0.10
Review Declaration of Settlement Administrator, and Research, Draft, Review, and/or Revise Plaintiffs' Notice of Motion and Motion for Final Approval of Class Action and PAGA Settlement, Attorneys' Fees and Costs, and Class Representative Enhancement Payments; Memorandum of Points and Authorities in Support Thereof, Declaration of Ryan Slinger in Support Thereof, and [Proposed] Final Approval Order and Judgment	22.50
Total Hours:	371.80

EXHIBIT 2

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Blanco vs. Autism Learning Partners, LLC, et al.

<u>Date</u>	<u>Payee</u>	<u>Expense Description</u>	<u>Amount</u>
9/28/2023	U.S. Postmaster	Postage	\$18.00
11/20/2023	U.S. Postmaster	Postage	\$35.08
11/20/2023	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
1/25/2024	Legal Document Server, Inc.	Attorney Service	\$115.88
1/25/2024	Los Angeles Superior Court	Complex Filing Fee	\$1,000.00
1/25/2024	Los Angeles Superior Court	Complaint Filing Fee	\$435.00
2/12/2024	ProLegal	Attorney Service	\$494.55
2/12/2024	ProLegal	Attorney Service	\$241.90
2/12/2024	Labor & Workforce Development Agency	PAGA Filing Fee	\$75.00
3/20/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
3/20/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
3/20/2024	Los Angeles Superior Court	Document Download Fee	\$17.40
4/30/2024	Legal Document Server, Inc.	Attorney Service	\$26.58
4/30/2024	Los Angeles Superior Court	Jury Fee	\$150.00
5/22/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
5/31/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
6/3/2024	Jacquelyn Silva	Travel Reimbursement	\$40.90
7/1/2024	Case Anywhere LLC	Attorney Service	\$125.31
7/31/2024	Lynn S. Frank	Mediation Fee	\$11,000.00
8/27/2024	General Logistics Systems US, Inc.	Courier Service	\$24.13
9/3/2024	Legal Document Server, Inc.	Attorney Service	\$17.54
9/3/2024	Los Angeles Superior Court	Stipulation & Order Fee	\$20.00
9/13/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
9/18/2024	CPAnalytics	Analysis of Sampling of Time Records	\$3,425.00
9/24/2024	Legal Document Server, Inc.	Attorney Service	\$16.15
10/1/2024	Case Anywhere LLC	Attorney Service	\$171.00
1/23/2025	Legal Document Server, Inc.	Attorney Service	\$18.70
1/23/2025	Legal Document Server, Inc.	Attorney Service	\$18.70
2/5/2025	Case Anywhere LLC	Attorney Service	\$73.00
2/10/2025	Legal Document Server, Inc.	Attorney Service	\$79.17
2/10/2025	Los Angeles Superior Court	Complaint Filing Fee	\$870.00
2/25/2025	Legal Document Server, Inc.	Attorney Service	\$18.70
3/4/2025	Legal Document Server, Inc.	Attorney Service	\$18.70
3/5/2025	Case Anywhere LLC	Attorney Service	\$61.00
3/7/2025	Legal Document Server, Inc.	Attorney Service	\$12.95
3/7/2025	Legal Document Server, Inc.	Attorney Service	\$18.70
3/11/2025	Legal Document Server, Inc.	Attorney Service	\$18.70

LAWYERS *for* JUSTICE, PC CASE COST DETAIL
Blanco vs. Autism Learning Partners, LLC, et al.

3/20/2025	Legal Document Server, Inc.	Attorney Service	\$18.70
3/21/2025	Legal Document Server, Inc.	Attorney Service	\$224.00
3/21/2025	Legal Document Server, Inc.	Attorney Service	\$22.87
3/21/2025	Los Angeles Superior Court	Motion Fee	\$60.00
4/4/2025	Case Anywhere LLC	Attorney Service	\$109.00
5/2/2025	Case Anywhere LLC	Attorney Service	\$49.00
7/24/2025	Legal Document Server, Inc.	Attorney Service	\$18.70
8/14/2025	Legal Document Server, Inc.	Attorney Service	\$18.70
9/25/2025	Legal Document Server, Inc.	Attorney Service	\$18.70
10/3/2025	Legal Document Server, Inc.	Attorney Service	\$18.70
10/30/2025	Legal Document Server, Inc.	Attorney Service	\$214.70
10/31/2025	Legal Document Server, Inc.	Attorney Service	\$18.70
11/12/2025	Legal Document Server, Inc.	Attorney Service	\$18.70
Total:			<u>\$19,623.96</u>